## UNITED STATES BANKRUPCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In Re:	) CASE NO. 23-42045
	) Chapter 13
	) Motion to Extend Stay
Rosella Buren	)
Debtor	) Hearing Date: 06/29/23
	) Hearing Time: 11:00 AM
Diana Daugherty	Courtroom 7 North
Trustee.	) William H Ridings, Jr.,
	) 2510 S. Brentwood Blvd., Ste. 205
	) Brentwood, MO 63144

## Motion to Extend the Automatic Stay

Comes now, the above Debtor through her attorney has requested that she file a Motion to Extend the Automatic Stay states as follows:

- 1. Debtor filed the above captioned case in good faith on June 13, 2023.
- 2. Debtor filed previous case on June 20, 2018 being case #18-40905 that was dismissed on April 06, 2023 for lack of feasibility.
- 3. Pursuant to 11 USC Section 362(c)(3)(A) the automatic stay will expire on the 30<sup>th</sup> day after filing the above captioned case.
- 4. The court may extend the automatic stay for the life of the case pursuant to 11 USC Section 362 (c) (3)(B).
- 5. Debtor's current case is filed in good faith. Debtor has filed all necessary schedules and paid all filing fees.
- 6. If the automatic stay is not extended, Debtor could lose their residence due to foreclosure.
- 7. Debtors change in circumstances is that her house has appreciated in value and she has decided to apply for a reverse mortgage, or refinance.

Wherefore, Debtors respectfully requests that this court continue the automatic stay in this case to the conclusion of the case, and for any and all further relief which this Court deems just and proper in the premises.

Respectfully submitted,

Date: June 16, 2023

/s/ William H. Ridings, Jr. William H. Ridings, Jr., #38672,

2510 South Brentwood, Ste. 205 Brentwood, MO 63144 (314)968-1313 (314)968-1302 fax ridingslaw2003@yahoo.com

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically on **June 16, 2023** with the United States Bankruptcy Court and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I hereby certify that a true and correct copy of the foregoing document was filed electronically on **June 16**, **2023** with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully prepaid, addresses to those parties listed on the Court's Manual Notice List and listed below on **June 16**, **2023**.

: /s/ William Ridings, Jr.,

Rosella Buren 16305 Hampden Pl St. Louis, MO 63034

See Attached Matrix